

Charles Wells - Modern Slavery and Human Trafficking Statement

At Charles Wells we are mindful that slavery and human trafficking are live and important issues that matter. As a caring family owned business we know we have a responsibility to be alert to the risks, however small, both in our business and in the wider supply chain. We fully expect our employees to flag any concerns they have and our managers are expected to act upon any reports made to them.

Definition

The Modern Slavery Act 2015 defines that a person commits an offence if:

- a) the person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude,
- (b) the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour,
- c) the person arranges or facilitates the travel of another person with a view to that other person being exploited.

Organisational structure and activities

Charles Wells is an independent family business built around brewing beer in Bedford and running pubs in the Midlands and South East of England and in France. Our current turnover is in excess of the £36 million threshold requiring us to comply with the Modern Slavery Act 2015.

The company is organised into three trading operations: the Brewing and Brands, Managed Houses and UK Leased & Tenanted Pubs.

We employ around 600 employees in the UK and France, we have relationships with our pub licensees and customers and purchase goods and services from around 1000 different businesses.

What do we purchase?

The majority of Charles Wells purchases relate to raw materials for beer production sourced from the UK or EU. We also purchase wines and spirits sourced from around the world and some limited amounts of clothing materials, promotional items and other ingredients sourced from the Far East. In addition we purchase food for our pubs. Largely sourced from the UK.

Due Diligence Process

Our supplier base has been analysed to assess the risk of exposure to for each category of goods or services purchased based on country of origin, type of goods and nature of supply. All of our suppliers are being written to in order to ascertain their understanding and level of compliance with what is required from the Act and to set out our conditions that we cannot trade with any company where slavery or human trafficking are involved in the supply chain at any point.

For goods or services that are determined as higher risk we will undertake further investigations which will result in our seeking alternative supply if we are not satisfied with the outcome.

We aim to have fully reviewed our supplier base by March 2017 and any new suppliers will be similarly vetted.

Communicating the message

All staff will have been briefed on the Act and that they should raise any suspicions of modern slavery or human trafficking with their manager.

All new staff will be briefed on the Act on joining the Company.

Directors will champion its understanding and implementation within the business and ensure Charles Wells is compliant with our policy.

Our Policy on Modern Slavery and Human Trafficking

Charles Wells does not tolerate modern slavery and human trafficking and we expect all those in our direct supply chain to comply with our values.

We will not forge commercial relationships with any business knowingly involved with slavery or human trafficking.

Any employee gaining knowledge of or suspecting that slavery or human trafficking is taking place in any part of the business or supply chain is obliged to report this to their manager. If a supplier is found to be demonstrating unacceptable practices we will investigate and provide guidance regarding immediate required improvements or seek alternative supply.

We will expect all who have, or seek a commercial relationship with our organisation to familiarise themselves with The Modern Slavery Act and our anti-slavery statement and act consistently within these.

We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Whilst only suppliers with turnover in excess of £36 million are required to comply with the Modern Slavery Act 2015 we have an expectation that smaller direct suppliers will still provide assurances to us that all of their employees are fairly remunerated and provided with an appropriate working environment.

Approval

This statement has been approved by the Company's Board of Directors.

Name:

A handwritten signature in blue ink, appearing to read 'J. Phillimore', with a long horizontal flourish extending to the right.

Position:

J. Phillimore
CEO

